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*Attorneys for Defendants
Visa Inc., Ryan McNerney,
Chris Suh, and Peter Andreski*

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

BEIBEI CAI, Individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

VISA INC. RYAN MCINERNEY, CHRIS SUH,
and PETER ANDRESKI,

Defendants.

Case No. 5:24-cv-08220-NW

CLASS ACTION

Judge: Hon. Noël Wise

**STIPULATION AND ~~[PROPOSED]~~
SCHEDULING ORDER**

****As Modified****

1 Lead Plaintiff Beibei Cai (“Plaintiff”) and Defendants Visa Inc., Ryan McInerney, Chris Suh,
 2 and Peter Andreski (collectively, “Defendants” and, together with Plaintiff, the “Parties”), by and
 3 through their counsel, stipulate as follows:

4 WHEREAS, on November 20, 2024, Plaintiff Cai filed a putative class action complaint against
 5 Defendants for alleged violations of Sections 10(b) and 20(a) of the Securities Exchange Act of 1934,
 6 which was assigned to the Honorable Jacqueline Scott Corley (ECF Nos. 1, 4);

7 WHEREAS, on January 17, 2025, Judge Corely vacated the initial case management conference
 8 and ordered, pursuant to the Parties’ stipulation, that within fourteen (14) days after the appointment of a
 9 lead plaintiff and lead counsel, the Parties would meet and confer and submit a proposed schedule for
 10 the filing of an amended complaint and a briefing schedule on Defendants’ anticipated motion to dismiss
 11 (ECF Nos. 11, 13);

12 WHEREAS, on February 24, 2025, this case was reassigned to Your Honor (ECF No. 20);

13 WHEREAS, pursuant to an Order dated April 23, 2025, the Court appointed Plaintiff Cai as
 14 Lead Plaintiff, approved of Lead Plaintiff’s selection of The Rosen Law Firm, P.A. as Lead Counsel,
 15 and set an initial case management conference for July 15, 2025 (ECF No. 31);

16 WHEREAS, this is a complex securities class action;

17 WHEREAS, the Parties believe an initial case management conference is unnecessary at this
 18 time because The Private Securities Litigation Reform Act of 1995 automatically stays discovery
 19 pending resolution of Defendants’ anticipated motion to dismiss; and

20 WHEREAS, the Parties proposed schedule will not have an effect on any pre-trial or trial dates
 21 as the Court has yet to schedule these dates.

22 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED BY AND BETWEEN
 23 THE PARTIES, that:

- 24 1. Lead Plaintiff shall file an Amended Complaint no later than July 15, 2025;
- 25 2. Defendants shall file their anticipated motion to dismiss the Amended Complaint no later
 26 than September 12, 2025; October 10, 2025
- 27 3. Lead Plaintiff shall file any opposition to such motion no later than ~~November 12, 2025;~~
October 24, 2025
- 28 4. Defendants shall file their reply to any such opposition no later than ~~December 12, 2025;~~

5. Defendants shall contact Chambers to schedule a hearing date in advance of filing their anticipated motion to dismiss; and

6. The Initial Case Management Conference is rescheduled to a date to be set by the Court after the Court's decision on Defendants' anticipated motion to dismiss.

Dated: May 7, 2025

Respectfully submitted,

THE ROSEN LAW FIRM, P.A.

By /s/ Laurence M. Rosen

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PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

DATED this 12th day of May 2025.



HON. NOËL WISE
United States District Judge